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February 24, 2017

VIA ECF

Honorable John Michael Vazquez  
United States District Judge  
United States Post Office and Courthouse Building  
One Federal Square  
Newark, New Jersey 07101

Re: *Sun v. Han, et al.*  
Civil Action No. 2:15-00703 (JMV)(MF)

Dear Judge Vazquez:

We are co-counsel for Lead Plaintiff Bin Qu in the above-referenced class action. Today, Lead Plaintiff filed with the Court his unopposed Motion for Preliminary Approval of Settlement, which sets forth the agreement of the settling parties to settle the Action, subject to the approval of the Court. The [Proposed] Order Preliminarily Approving the Proposed Settlement and Providing for Notice (the "Preliminary Approval Order") is also submitted with the Notice of Motion as a separate document.

Should the Court grant preliminary approval of the proposed Settlement, Lead Plaintiff respectfully propose that the Court adopt the schedule set forth in the Motion for the mailing and publication of notice to the Settlement Class, and the deadlines for opting out of, or objecting to, the Proposed Settlement, as set forth in the Preliminary Approval Order. The schedule is driven by the date on which preliminary approval of the Settlement is granted and the date selected for the final approval hearing (the "Settlement Hearing"). All parties to the proposed Settlement have consented to the terms of the proposed Order.

Finally, consistent with our most recent discussions with Judge Falk, if the Court enters the Preliminary Approval Order, Plaintiffs will endeavor to either move for the entry of default judgments against the two remaining defendants or file proof of service at least 60 days before the Settlement Hearing.

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We appreciate the Court's consideration of this matter. The parties are available at Your Honor's convenience to answer any questions the Court may have.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.

/s/ Donald A. Ecklund

DONALD A. ECKLUND

cc: Hon. Mark Falk, U.S.M.J. (via ECF)  
All Counsel of Record (via ECF)